

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA**  
Alexandria Division

<b>JODI C. MAHDAVI,</b>	)	
	)	
Plaintiff,	)	
	)	
v.	)	Civil Action No. 1:14-cv-0648
	)	
<b>NEXTGEAR CAPITAL, INC.,</b>	)	
	)	
Defendants.	)	

**DEFENDANT NEXTGEAR CAPITAL, INC.'S  
REQUESTED VOIR DIRE**

NextGear Capital, Inc., pursuant to Federal Rule of Civil Procedure 47(a) and Local Civil Rule 51, respectfully requests that the Court examine prospective jurors as follows:

1. This case involves a claim by Jodi C. Mahdavi that she is the rightful owner of a white 2013 BMW 650i Gran Coupe. The BMW is currently possessed by NextGear Capital, Inc., the company who financed the purchase of the vehicle and has a security interest in the vehicle. Mrs. Mahdavi claims to have purchased the vehicle from a dealership that borrowed money from NextGear. Do you have any knowledge concerning the facts of this case or know anything about this lawsuit?
2. The plaintiff is Jodi C. Mahdavi. Do you know or think you know Jodi Mahdavi?
3. Jodi Mahdavi is represented in this case by attorney Jonathan E. Levine. Do you know, or think you know, Mr. Levine? Have you done business or had any dealings with the law firm of Levine, Daniels & Allnutt, PLLC?
4. NextGear Capital, Inc. has been named as a defendant. NextGear is an automobile floorplan financier, which is a company that provides loans to automobile dealers.

Do you have any association, connection, or past experience with NextGear Capital, Inc. or any other floorplan financing company?

5. Do you know of any person who works for or who has ever worked for NextGear Capital, Inc.?

6. The defendant is represented by attorneys James D. Bragdon and David G. Sommer of the law firm of Gallagher Evelius & Jones LLP. Do you know, or think you know, these attorneys? Have you done business or had any dealings with the law firm?

7. This case will involve the testimony of numerous witnesses. The parties have indicated that the following persons may be called as witnesses. Please indicate whether you know, or think you know, any of the following persons: Jodi C. Mahdavi, Kerry Howard, April Rector, David Freeman, Lisa Long, Sherman Swartz, Khazeyer "Emil" Molavi, or Navid Houssein "Alex" Mahdavi.

8. NextGear provided financing to Beltway Auto Brokers, LLC, which is located in Hanover, Maryland and known by the name of Baltimore Washington Auto Outlet? Do you or anyone you know have any association, connection, or past experience with Baltimore Washington Auto Outlet?

9. Have you, or any of your relatives or close friends, been employed by an automobile dealer or worked in motor vehicle sales? If so, please describe that experience.

10. Have you, or any close friend or member of your immediate family, ever been a party or a witness in a case involving an automobile dealer?

11. NextGear Capital, Inc. is a large corporation. Will you be able to be completely impartial towards a corporation, and decide this case solely on the facts, without being influenced in any way by the fact that a corporation is being sued by an individual?

12. NextGear Capital, Inc. provides lending services to businesses. Will you be able to be completely impartial towards a lender, and decide this case solely on the facts, without being influenced in any way by the fact that a lender is being sued by an individual?

13. This case involves a BMW automobile. Have you, or any of your family members or close friends, ever owned a BMW?

14. Have you, or any of your family members or close friends, ever had any dealings with BMW or automobiles manufactured by BMW?

15. Do you, or any of your family members or close friends, have any association, connection, or past experience with P.A.R. Services, Inc., an automobile repossession company that conducts business in northern Virginia?

16. Have you, anyone in your family, or a close friend ever participated in a civil lawsuit, either as a plaintiff or a defendant? If so, please describe that experience and indicate if anything associated with that experience would affect your ability to judge this case objectively and impartially.

17. This case involves a repossession of an automobile by a lender. Do you, anyone in your family, or any of your close friends have any experience with a lender's repossession of an automobile or any other property? If so, please describe that experience.

18. Have you ever been subject to a collection action or foreclosure action by a creditor or lender? If so, please describe that experience.

19. Do you, anyone in your family, or any of your close friends have any legal training or legal educational background?

20. Do you have any belief, opinion, or suspicion about lawsuits or the law that would prevent you from following the instructions of the Court on the law even though you may disagree with those instructions?

21. Do you know of any reason why you might have difficulty judging this case on the merits objectively and impartially?

22. The trial of this case is expected to require approximately two days for completion. Do you believe that you cannot participate in this trial for that length of time?

Respectfully Submitted,

NextGear Capital, Inc.

By /s/ James D. Bragdon

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*Counsel for NextGear Capital, Inc.*

**CERTIFICATE OF SERVICE**

I hereby certify that on this 21st day of April, 2015, I electronically filed a true and correct copy of the foregoing Requested Voir Dire with the Clerk of the Court using the CM/ECF system, which will then send a notification of such filing (NEF) to the following:

Jonathan E. Levine, Esq.  
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*Counsel for P.A.R. Services*

And will send a copy by Federal Express to:

The Honorable Theresa C. Buchanan  
Magistrate Judge  
United States District Court  
Eastern District of Virginia  
Alexandria Division  
401 Courthouse Square  
Alexandria, Virginia 22314-5798

To the best of my knowledge there are no other parties who require service by other means.

/s/ James D. Bragdon  
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